

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	Cr. No. 04-10032-GAO
v.	)	
	)	
JOAN REYES SANTANA	)	

EXHIBIT LIST OF THE UNITED STATES OF AMERICA

The United States of America hereby files the following list of Proposed Exhibits for the trial in the above-captioned matter. The government reserves its right to supplement, modify and number the list in light of the evidence that is admitted at trial and with reasonable notice to the defendant.

Exhibit Number	Exhibit
A	Chart of Heroin Purchases/Seizures
1	Stipulation regarding Drug Exhibits
2	Photographs of 7/9 Ohio Street
3	Search Warrant for 7/9 Ohio Street
4a-c	Identification Cards seized from 7/9 Ohio Street on January 20, 2004
5a-d	Telephones seized from 7/9 Ohio Street on January 20, 2004
6	Verizon Wireless Records seized from 7/9 Ohio Street on January 20, 2004
7	Sprint Telephone Records Seized from 7/9/ Ohio Street on January 20, 2004
8	Photographs of vacuum cleaner from 7/9 Ohio bedroom taken on January 20, 2004
9	Finger of Heroin seized from 7/9/ Ohio Street on January 20, 2004

- 10 Photographs of cash at 7/9/ Ohio Street on January 20, 2004
- 11 Cash seized from 7/9 Ohio Street on January 20, 2004
- 12 Application for employment seized from 7/9/ Ohio Street on January 20, 2004
- 13 Photographs of 30 May Street
- 14 Search Warrant for 30 May Street
- 15 Identification card for Eva Fernandez seized from 30 May Street on January 20, 2004
- 16 FBI Exhibit 53-conversations with Victor Delgado on November 4, 2003
- 16A Translated Transcript for FBI Exhibit 52-Excerpted conversations with Victor Delgado on November 4, 2003
- 17 White powder contained in a wax case cylinder that was obtained on November 4, 2003
- 18 FBI Exhibit 68-conversations with Victor Delgado on November 7, 2003
- 18A Translated Transcript for FBI Exhibit 68-Excerpted conversations with Victor Delgado on November 7, 2003
- 19 White powder contained in a wax case cylinder and packaged in an untied plastic shopping bag that was obtained on November 7, 2003
- 20 FBI Exhibit 53-conversations with Victor Delgado on November 11, 2003
- 20A Translated Transcript for FBI Exhibit 53-Excerpted conversations with Victor Delgado on November 11, 2003
- 21 White powder contained in a wax case

- cylinder and a rubber like cylinder  
obtained on November 11, 2003
- 22 FBI Exhibit 57-conversations with Victor  
Delgado on November 13, 2003
- 22A Translated Transcript for FBI Exhibit  
57-Excerpted conversations with Victor  
Delgado on November 13, 2003
- 23 White powder contained in a wax case  
cylinder and a rubber like cylinder  
obtained on November 13, 2003
- 24 FBI Exhibit 62/63-Excerpted  
conversations with Victor Delgado on  
November 17, 2003
- 24A Translated Transcript for FBI Exhibit  
62/63-Excerpted conversations with  
Victor Delgado on November 17, 2003
- 25 White powder contained in a two wax case  
cylinders and a rubber like cylinder  
obtained on November 17, 2003
- 26 FBI Exhibit 72/73- conversations with  
Victor Delgado on November 25, 2003
- 26A Translated Transcript for FBI Exhibit  
72/73-Excerpted conversations with  
Victor Delgado on November 25, 2003
- 27 White powder contained in two wax case  
cylinders obtained on November 25, 2003
- 28 FBI Exhibit 70/74-conversations with  
Victor Delgado on December 1, 2003
- 28A Translated Transcript for FBI Exhibit  
70/74-Excerpted conversations with  
Victor Delgado on December 1, 2003
- 29 White powder contained in two pink wax  
cylinders obtained on December 1, 2003
- 28 FBI Exhibit 75-conversations with Victor  
Delgado on December 4, 2003

- 28A Translated Transcript for FBI Exhibit 75-Excerpted conversations with Victor Delgado on December 4, 2003
- 29 White powder contained in two pink wax cylinders obtained on December 4, 2003
- 30 FBI Exhibit ID 91- Four Conversations with Joan Reyes-Santana on January 12, 2004
- 30A-D Translated Transcript for FBI Exhibit 91-conversations with Joan Reyes-Santana on January 12, 2004
- 30E FBI Exhibit ID 90- Conversations with Joan Reyes-Santana on January 12, 2004
- 30F Translated Transcript for FBI Exhibit 90-conversations with Joan Reyes-Santana on January 12, 2004
- 31 White powder contained in a wax case cylinder obtained on January 12, 2004
- 32 FBI Exhibit 92-Excerpted conversations with Joan Reyes-Santana on January 13, 2004
- 33 FBI Exhibit 93-Excerpted conversations with Joan Reyes-Santana on January 14, 2004 (video)
- 34,34A Comcast Telephone Records for 978-258-3919 Eva Fernandez, 30 May Street, apartment C
- 35 T-Mobile Prepaid Telephone Records for 978-902-1647
- 36 Sprint Spectrum Records for 978-590-7571 Joan Reyes Santana 9 Ohio Street
- 37 Verizon Wireless Records for 978-314-3332 Joan Reyes Santana 9 Ohio Street
- 38 Verizon 978-689-4831 records for Wanda Rivera, 9 Ohio Street, 2<sup>nd</sup> Floor

- 39 Telephone Key and Summary Chronologies  
for Telephone conversations between  
Victor Delgado and Joan Reyes Santana on  
November 4, 2003, November 7, 2003,  
November 11, 2003, November 17, 2003,  
November 25, 2003, December 1, 2003, and  
December 4, 2003
- 40 Phone Chronology December 4, 2003-  
December 31, 2003

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s John A. Wortmann, Jr. \_\_\_\_\_  
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Date: September 5, 2004

**CERTIFICATE OF SERVICE**

I, John A. Wortmann, Jr., do hereby certify that a copy of the foregoing was served on Tim Watkins, counsel for Joan Reyes Santana.

/s John A. Wortmann, Jr. 9-5-04  
JOHN A. WORTMANN, JR.